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May 7, 1993

Via Certified Mail
Return Receipt Requested

Ms. Yvonna Jackson
DPRA Inc.
53 West Jackson Boulevard
Suite # 1102
Chicago, Illinois 60605

Re: American Chemical Service ("ACS") CERCLA Site --
Griffith, Indiana

Dear Ms. Jackson:

I am writing on behalf of Amerace Corporation ("Amerace") for two reasons: (1) to respond to a special notice letter that was addressed to the "Emconite Division (Stimsonite)" ("Stimsonite" herein) regarding its potential liability at the above-referenced site; and (2) to request that you update your files regarding future correspondence with Stimsonite.

Amerace is responding to this special notice letter on behalf of Stimsonite because Stimsonite was formerly part of the Signal Products Division of Amerace.^{1/} Amerace sold the Stimsonite facility in Niles, Illinois a few years ago. The facility, currently owned by the Stimsonite Corporation, which received EPA's special notice letter on April 26, 1993, forwarded it to Amerace, which received it on May 4, 1993.

Amerace is not in a position to commit at this time to reimburse EPA for the past costs it identifies in the special notice letter, which costs may be inconsistent with the National Contingency Plan. Through this letter, Amerace requests additional information clarifying that those costs EPA alleges it has incurred at the ACS site that are not inconsistent with the NCP. Also, by a separate request under the Freedom of

1/ Amerace will respond in a separate letter to a special notice letter addressed to the "Emconite Division, Signal Products Division of AM," which was also a separate division of Amerace.

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Information Act, Amerace is requesting all information available to EPA which it alleges in any way links Emconite with the ACS site.

Amerace has joined a PRP group ("Group") on behalf of Stimsonite. The Group's counsel, Andrew H. Perellis (of Coffield, Ungaretti & Harris), attended EPA's "kick-off" meeting of April 28, 1993 and served as Amerace's representative to that meeting. Amerace's membership in the Group indicates that it is prepared to further explore and negotiate a possible voluntary agreement to implement required remediation at the ACS site. However, Amerace's response to the special notice letter and its concurrent participation in the Group shall not be construed to be in any manner an admission of any liability under the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended, or otherwise, with regard to the ACS site.

Finally, I request that you update your contact information for Stimsonite as indicated below. All future correspondence should be sent to both Lowell F. Martin (Morgan, Lewis & Bockius) and Eugene C. Holloway (Amerace).

PRP identified by EPA:

Emconite Division (Stimsonite)
Amerace Corp.
7542 N. Natchez Ave.
Niles, IL 60648

Stimsonite Contacts:

Lowell F. Martin, Esq.
Morgan Lewis & Bockius
1800 M Street, N.W.
Washington, D.C. 20036
Tel: (202) 467-7152
Fax: (202) 467-7176

Eugene C. Holloway, Esq.
Vice President, Secretary
& General Counsel
Amerace Corp. Legal Dept.
Route 24
Hackettstown, NJ 07840
Tel: (908) 813-2037
Fax: (908) 852-2461

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If you have any questions, please do not hesitate to phone Lowell Martin at (202) 467-7152. I appreciate your assistance in this matter.

Sincerely,



Kala Shah
Counsel for Amerace

cc: Eugene C. Holloway, Esq.
Andrew H. Perellis, Esq.